IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONNA CURLING, ET AL., **Plaintiffs,** **v.** **BRAD RAFFENSPERGER, ET AL.,** **Defendants.**	**DECLARATION OF REBECCA WILSON IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION** **Civil Action No. 1:17-CV-2989-AT**

I, Rebecca Wilson, hereby declare as follows:

1.   I serve as a Republican/Unaffiliated Chief Election Judge in Prince George's County, Maryland. In Maryland, a bipartisan pair of "Chief Judges" supervises and manages each polling place on Election Day. In Georgia, a similar official would be known as a "supervisor."

2.   I have been serving in Precinct 17–01 since 2004. Prior to 2016, Maryland used Diebold's AccuVote Touchscreen Direct Recording Electronic (DREs) voting machines, the same voting equipment that I understand Georgia uses today. I supervised 11 elections in Precinct 17-01 using that equipment.

3.   In 2016, Maryland switched to voter-marked paper ballots scanned by ballot scanners in the precinct. I have now supervised four elections using paper ballots scanned by the new equipment.

1

4.   Based on my experience setting up and managing elections using both DREs and hand-marked paper ballots, the ballot-scanning system is far easier and faster to set up, manage, and close than the previous DRE equipment was. Election results are available just a few minutes after the polls close. Voters can vote more quickly when they are hand-marking a paper ballot, and officials are not constrained by the number of machines per precinct – in high turnout contests, they can easily set up additional stations at which to mark paper ballots – which helps cut down on long lines. Voters and election officials were pleased with the new equipment and the elections generally went smoothly throughout Maryland.

Practical Advantages to Paper Ballot Voting System

5.   After the switch to paper ballots in 2016, it was far easier to set up the equipment on Election Day morning and to open the polls on time.

6.   Under Maryland's procedures, setting up each DRE required 43 steps. Our polling precinct deployed between11 and 17 DREs at a time, depending on anticipated turnout. As a result, setting up the DREs prior to opening the polling place for an election meant running through 473 to 731 steps.

7.   Setting up the ballot-scanning equipment and accessible ballot-marking devices requires far fewer steps. In addition, we require fewer voting machines (one or two ballot scanners and one ExpressVote Ballot-Marking Device (BMD) for use

by voters with disabilities). Setting up the equipment for a paper-ballot-based election requires 50 to 82 steps before opening the polls.

8.   In addition, after switching to paper ballots in 2016, it was far easier to close down the equipment on Election Night and to obtain election results quickly. During the time Maryland used DREs, precinct results in my county generally were not available until one or two hours after the polls closed. In contrast, precinct results from the ballot scanners in my precinct were available 15 to 20 minutes after the polls closed in the four elections where we have used paper ballots and ballot scanners.

Security of Paper Ballot Election Administration

9.   In my role in supervising the polling place, I found it far easier to monitor the physical security of the ballot scanning system than the DRE system.

10.   Paper ballots and the ballot scanner are securely controlled, preventing anyone from accessing voted ballots or voting with multiple ballots. Voters do not have unattended access to the voted ballots or unvoted paper ballot stock or the ballot scanning machine. An election judge is stationed at the ballot scanner all day and supervises each voter's brief interaction with the machine.

11.   In contrast, DREs are at a great risk of intrusion. Each voter is left unattended with his or her DRE voting machine for up to 30 minutes, depending upon the length of the ballot. If a voter wants to access the compartment of the

machine where the memory card is stored, or cast multiple ballots with forged voter access cards, or manipulate the machine in other ways, it likely would have been difficult for poll workers to detect.

12.   Moreover, DREs are far easier to physically access. The memory card compartment of the DRE is locked with a commonly available key that is the same key used by every Diebold DRE, as well as by many other devices such as hotel minibars. ***This information has been widely published for many years.***

13.   Despite the enormous time and attention devoted to monitoring the physical security of the DREs, most additional measures are mere "security theater." These precautions could not prevent or detect the most dangerous type of threat to the security of the machines: the threat of insiders or hackers tampering with the software on which the machines operate. While a ballot-scanning system also runs on software that can be hacked, the voter-marked paper ballots provide a software-independent means to verify that election results are accurate.

Voter Confidence

14.   Voters have expressed to me that they were very happy with the new paper balloting equipment in Maryland. Based on my experience, I foresee little to no confusion among voters if Georgia switches from DREs to paper ballots.

15.   Before the 2016 elections, Maryland's State Board of Elections had planned to spend $1.8 million on a voter outreach campaign to inform voters about

4

the switch to our new voting system. But the budget for this outreach was not approved, so Maryland relied on free outreach to the public via a few news stories and public events.

16. Election officials were concerned that the new system would confuse voters. But I found that voters were very comfortable with marking paper ballots. Most had completed standardized tests or been in similar situations where they indicated choices by filling in ovals. Our election judges informally polled voters about their experience with the new voting system while we gave them their "I voted" stickers as they exited the polling place. The comments were overwhelmingly positive.

17. Many voters also expressed more confidence that their vote would be counted accurately with the paper ballots, and appreciated the ability to do meaningful recounts—something DREs do not provide.

Paper Ballots Reduce Wait Times

18. Finally, voting was much faster after Maryland switched. In previous elections with our DREs, we had documented wait times as long as 105 minutes to check in at our polling place. With the paper ballots and ballot scanners, *we experienced wait times no longer than 10 minutes at the check-in table*.

19. This is in part because each precinct was limited by the number of DREs it had available, and because the physical set up for paper ballot voting allows

for more people to vote at a time. At times of peak demand, we could quickly and easily expand the number of marking stations available by allowing voters to use the ballot-marking areas provided for provisional voters if they were not occupied or to use tables and chairs at the perimeter of the room.

20.   The brightly lit, upright screens of the DREs made voter privacy concerns important in the previous polling place layout. DREs had to be carefully positioned to provide voters with as much privacy as possible to prevent other voters from seeing their votes. In contrast, paper ballots are marked flat in a booth or on a table behind a privacy screen where the voter's body tends to block the view of anyone walking by. Booths can be placed closer together without risk of compromising voters' privacy.

21.   The need for the DREs to have their power cords "daisy-chained" to each other and plugged into a wall outlet limited the area within the room where the DREs could be placed. We had to position them near the outer walls of the room with access to power outlets. With paper ballots, we can position our free-standing voting booths anywhere in the room that is convenient for us. We cluster them back to back in the center of the room where they occupy a much smaller footprint than the DREs used to. This leaves us space at the outer edges of the room for tables with privacy screens if needed for overflow.

22.   Finally, with the DREs, we had no options for expansion to accommodate times of peak demand – it was not possible to quickly add new machines if a precinct was particularly busy or if machines malfunctioned and had to be removed from service. Paper ballots allow greater flexibility in meeting changing needs throughout Election Day; with paper ballots, it is possible to quickly add additional booths if voter turnout is higher than anticipated.

23.   In conclusion, I believe Georgia would greatly benefit from paper ballots and ballot scanners and that they would be able to move to a paper ballot system quickly and easily. In contrast to DREs, paper ballots are a faster, more convenient, more secure, and less expensive way to vote.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 28, 2019
      Hyattsville, Maryland

Rebecca Wilson